

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

BEFORE THE  
BOARD OF VOCATIONAL NURSING  
AND PSYCHIATRIC TECHNICIANS  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA

In the Matter of the Statement of Issues  
Against:

Case No. VN-2009-2217

IRENE R. KIRAN  
2356 Hearthsong Drive  
Riverbank, CA 95367

Applicant for Vocational Nurse License

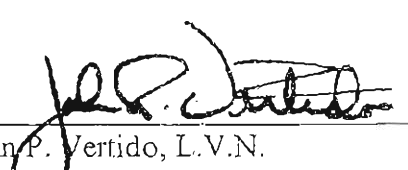
Respondent.

DECISION

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Board of Vocational Nursing and Psychiatric Technicians as the final Decision in the above-entitled matter.

This Decision shall become effective on April 16, 2011.

IT IS SO ORDERED this 17<sup>th</sup> day of March, 2011.

  
\_\_\_\_\_  
John P. Vertido, L.V.N.  
President

1 KAMALA D. HARRIS  
Attorney General of California  
2 ARTHUR D. TAGGART  
Supervising Deputy Attorney General  
3 ELENA L. ALMANZO  
Deputy Attorney General  
4 State Bar No. 131058  
1300 I Street, Suite 125  
5 P.O. Box 944255  
Sacramento, CA 94244-2550  
6 Telephone: (916) 322-5524  
Facsimile: (916) 327-8643  
7 *Attorneys for Complainant*

8 **BEFORE THE**  
**BOARD OF VOCATIONAL NURSING AND PSYCHIATRIC TECHNICIANS**  
9 **DEPARTMENT OF CONSUMER AFFAIRS**  
10 **STATE OF CALIFORNIA**

11 In the Matter of the Statement of Issues Against:

Case No. VN-2009-2217

12 **IRENE R. KIRAN aka**  
13 **IRENE RESHMI KIRAN**  
14 **2356 Hearthsong Drive**  
15 **Riverbank, California 95367**

**STIPULATED SETTLEMENT AND  
DISCIPLINARY ORDER**

16 Applicant/Respondent.

17  
18 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-  
19 entitled proceedings that the following matters are true:

20 **PARTIES**

21 1. Teresa Bello-Jones, J.D., M.S.N., R.N. (Complainant) is the Executive Officer of  
22 the Board of Vocational Nursing and Psychiatric Technicians. She brought this action solely in  
23 her official capacity and is represented in this matter by Kamala D. Harris, Attorney General of  
24 the State of California, by Elena L. Almanzo, Deputy Attorney General.

25 2. Respondent Irene R. Kiran (Respondent) is represented in this proceeding by  
26 attorney Samuel Spital, whose address is: Samuel Spital, 8880 Rio San Diego Drive, Suite 800,  
27 San Diego, CA 92108.

28 ///

3. On or about October 14, 2009, Respondent filed an application dated August 6, 2009, with the Board of Vocational Nursing and Psychiatric Technicians to obtain a Vocational Nurse License.

## JURISDICTION

4. Statement of Issues No. VN-2009-2217 was filed before the Board of Vocational Nursing and Psychiatric Technicians (Board), Department of Consumer Affairs, and is currently pending against Respondent. The Statement of Issues and all other statutorily required documents were properly served on Respondent on January 24, 2011. Respondent timely filed her Notice of Defense contesting the Statement of Issues. A copy of Statement of Issues No. VN-2009-2217 is attached as exhibit A and incorporated herein by reference.

## ADVISEMENT AND WAIVERS

5. Respondent has carefully read, fully discussed with counsel, and understands the charges and allegations in Statement of Issues No. VN-2009-2217. Respondent has also carefully read, fully discussed with counsel, and understands the effects of this Stipulated Settlement and Disciplinary Order.

6. Respondent is fully aware of her legal rights in this matter, including the right to a hearing on the charges and allegations in the Statement of Issues; the right to be represented by counsel at her own expense; the right to confront and cross-examine the witnesses against her; the right to present evidence and to testify on her own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the production of documents; the right to reconsideration and court review of an adverse decision; and all other rights accorded by the California Administrative Procedure Act and other applicable laws.

7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

## CULPABILITY

8. Respondent admits the truth of each and every charge and allegation in Statement of Issues No. VN-2009-2217.

///

1 ///

2 9. Respondent agrees that her Vocational Nurse License is subject to denial and she  
3 agrees to be bound by the Board of Vocational Nursing and Psychiatric Technicians (Board)'s  
4 probationary terms as set forth in the Disciplinary Order below.

5 **CONTINGENCY**

6 10. This stipulation shall be subject to approval by the Board of Vocational Nursing  
7 and Psychiatric Technicians. Respondent understands and agrees that counsel for Complainant  
8 and the staff of the Board of Vocational Nursing and Psychiatric Technicians may communicate  
9 directly with the Board regarding this stipulation and settlement, without notice to or participation  
10 by Respondent or her counsel. By signing the stipulation, Respondent understands and agrees  
11 that she may not withdraw her agreement or seek to rescind the stipulation prior to the time the  
12 Board considers and acts upon it. If the Board fails to adopt this stipulation as its Decision and  
13 Order, the Stipulated Settlement and Disciplinary Order shall be of no force or effect, except for  
14 this paragraph, it shall be inadmissible in any legal action between the parties, and the Board shall  
15 not be disqualified from further action by having considered this matter.

16 11. The parties understand and agree that facsimile copies of this Stipulated Settlement  
17 and Disciplinary Order, including facsimile signatures thereto, shall have the same force and  
18 effect as the originals.

19 12. This Stipulated Settlement and Disciplinary Order is intended by the parties to be  
20 an integrated writing representing the complete, final, and exclusive embodiment of their  
21 agreement. It supersedes any and all prior or contemporaneous agreements, understandings,  
22 discussions, negotiations, and commitments (written or oral). This Stipulated Settlement and  
23 Disciplinary Order may not be altered, amended, modified, supplemented, or otherwise changed  
24 except by a writing executed by an authorized representative of each of the parties.

25 13. In consideration of the foregoing admissions and stipulations, the parties agree that  
26 the Board may, without further notice or formal proceeding, issue and enter the following  
27 Disciplinary Order:

28 ///

**DISCIPLINARY ORDER**

IT IS HEREBY ORDERED that the Board will issue Respondent Irene R. Kiran aka Irene Reshmi Kiran a Vocational Nurse License which will be immediately revoked. The revocation will be stayed and the Respondent placed on three (3) years probation on the following terms and conditions.

1. OBEY ALL LAWS. Respondent shall obey all federal, state and local laws, including all statutes and regulations governing the license. Respondent shall submit, in writing, a full and detailed account of any and all violations of the law, including alleged violations, to the Board within five (5) days of occurrence.

To ensure compliance with this condition, Respondent shall submit fingerprints through the Department of Justice and Federal Bureau of Investigation within thirty (30) days of the effective date of the decision, unless the Board determines that fingerprints were previously submitted by the Respondent to the Board.

Respondent shall also submit to the Board a recent 2" x 2" photograph of her within thirty (30) days of the effective date of the decision.

If Respondent is under a criminal court order, including probation or parole, and the order is violated, it shall be deemed a violation of these probation conditions.

2. COMPLIANCE WITH PROBATION PROGRAM. Respondent shall fully comply with the conditions of probation established by the Board and shall cooperate with representatives of the Board in its monitoring and investigation of the Respondent's compliance with the Probation Program.

Upon successful completion of probation, the Respondent's license will be fully restored.

3. SUBMIT WRITTEN REPORTS. Respondent shall submit or cause to be submitted, under penalty of perjury, any written reports, declarations and verification of actions as required by the Board or its representatives. These reports or declarations shall contain statements relative to Respondent's compliance with all the conditions of the Board's Program. Respondent shall immediately execute all release of information forms as may be required by the Board or its representatives.

1 In the first report, Respondent shall provide a list of all states and territories where she has  
2 ever been licensed as a vocational/practical nurse, psychiatric technician, or registered nurse.  
3 Respondent shall provide information regarding the status of each license and any change in  
4 license status during the period of probation. Respondent shall inform the Board if she applies for  
5 or obtains a new nursing or psychiatric technician license during the period of probation.

6 Respondent shall provide a copy of the Board's decision to the regulatory agency in every  
7 state and territory in which she has applied for or holds a vocational/practical nurse, psychiatric  
8 technician and/or registered nurse license.

9 4. NOTIFICATION OF ADDRESS AND TELEPHONE NUMBER CHANGE(S).

10 Respondent shall notify the Board, in writing, within five (5) days of any change in address or  
11 telephone number(s).

12 Respondent's failure to claim mail sent by the Board may be deemed a violation of these  
13 probation conditions.

14 5. NOTIFICATION OF RESIDENCY OR PRACTICE OUTSIDE OF STATE.

15 Respondent shall notify the Board, in writing, within five (5) days, if she leaves California to  
16 reside or practice in another state. Periods of residency or practice outside of California shall not  
17 apply toward a reduction of this probation time period. If Respondent resides or practices outside  
18 of California, the period of probation shall be automatically extended for the same time period  
19 she resides or practices outside of California. The Respondent shall provide written notice to the  
20 Board within five (5) days of any change of residency or practice.

21 Respondent shall notify the Board, in writing, within five (5) days, upon her return to  
22 California.

23 6. MEETINGS WITH BOARD REPRESENTATIVE(S). Respondent shall appear in  
24 person at meetings as directed by the Board or its designated representatives.

25 7. NOTIFICATION TO EMPLOYER(S). When currently employed or applying for  
26 employment in any capacity in any health care profession, Respondent shall notify her employer  
27 of the probationary status of Respondent's license. This notification to the Respondent's current  
28 health care employer shall occur no later than the effective date of the Decision. The Respondent

1 shall notify any prospective health care employer of the probationary status with the Board prior  
2 to accepting such employment. At a minimum, this notification shall be accomplished by  
3 providing the employer or prospective employer with a copy of the Board's Accusation and  
4 Disciplinary Decision.

5 The Health Care Profession includes, but is not limited to: Licensed Vocational Nurse,  
6 Psychiatric Technician, Registered Nurse, Medical Assistant, Paramedic, Emergency Medical  
7 Technician, Certified Nursing Assistant, Home Health Aide, and all other ancillary technical  
8 health care positions.

9 Respondent shall cause each health care employer to submit to the Board all performance  
10 evaluations and any other employment related reports as required by the Board. Respondent shall  
11 notify the Board, in writing, of any difficulty in securing employer reports within five (5) days of  
12 such an event.

13 Respondent shall notify the Board, in writing, within five (5) days of any change in  
14 employment status. Respondent shall notify the Board, in writing, if she is terminated or  
15 separated, regardless of cause, from any nursing or health care related employment with a full  
16 explanation of the circumstances surrounding the termination or separation.

17 8. EMPLOYMENT REQUIREMENTS AND LIMITATIONS. Respondent shall work in  
18 her licensed capacity in the state of California. This practice shall consist of no less than six (6)  
19 continuous months and of no less than twenty (20) hours per week.

20 Respondent shall not work for a nurses' registry or in any private duty position, a  
21 temporary nurse placement agency, as a faculty member in an accredited or approved school of  
22 nursing, or as an instructor in a Board approved continuing education course except as approved,  
23 in writing, by the Board. Respondent shall work only on a regularly assigned, identified and  
24 predetermined work site(s) and shall not work in a float capacity except as approved, in writing,  
25 by the Board.

26 9. SUPERVISION REQUIREMENTS. Before commencing or continuing employment  
27 in any health care profession, Respondent shall obtain approval from the Board of the supervision  
28 provided to the Respondent while employed.

Respondent shall not function as a charge nurse (i.e., work in any healthcare setting as the person who oversees or directs licensed vocational nurses, psychiatric technicians, certified nursing assistants or unlicensed assistive personnel) or supervising psychiatric technician during the period of probation except as approved, in writing, by the Board.

10. COMPLETION OF EDUCATIONAL COURSE(S). Respondent, at her own expense, shall enroll and successfully complete a course(s) substantially related to the violation(s) no later than the end of the first year of probation.

The coursework shall be in addition to that required for license renewal. The Board shall notify the Respondent of the course content and number of contact hours required. Within thirty (30) days of the Board's written notification of assigned coursework, Respondent shall submit a written plan to comply with this requirement. The Board shall approve such plan prior to enrollment in any course of study.

Upon successful completion of the course, Respondent shall submit "original" completion certificates to the Board within thirty (30) days of course completion.

11. MAINTENANCE OF VALID LICENSE. Respondent shall, at all times, maintain an active current license with the Board including any period of suspension.

If an initial license must be issued (Statement of Issues) or a license is reinstated, probation shall not commence until a license is issued by the Board. Respondent must complete the licensure process within two (2) years from the effective date of the Board's decision.

Should Respondent's license expire, by operation of law or otherwise, upon renewal or reinstatement, Respondent's license shall be subject to any and all conditions of this probation not previously satisfied.

12. LICENSE SURRENDER. During probation, if Respondent ceases practicing due to retirement, health reasons, or is otherwise unable to satisfy the conditions of probation, Respondent may surrender her license to the Board. The Board reserves the right to evaluate Respondent's request and to exercise its discretion whether to grant the request without further hearing. Upon formal acceptance of the tendered license, Respondent will no longer be subject to the conditions of probation.



1 Surrender of Respondent's license shall be considered a disciplinary action and shall  
2 become a part of Respondent's license history with the Board. A licensee who surrenders her  
3 license may petition the Board for reinstatement no sooner than the following minimum periods  
4 from the effective date of the disciplinary decision for the surrender: Three (3) years for  
5 reinstatement of a license surrendered for any reason other than a mental or physical illness; or  
6 one (1) year for a license surrendered for a mental or physical illness.

7 13. VIOLATION OF PROBATION. If Respondent violates the conditions of her  
8 probation, the Board, after giving the Respondent notice and an opportunity to be heard, may set  
9 aside the stay order and impose the stayed discipline revocation of the Respondent's license. If  
10 during probation, an accusation or petition to revoke probation has been filed against the  
11 Respondent's license or the Attorney General's Office has been requested to prepare an  
12 accusation or petition to revoke probation against the Respondent's license, the probationary  
13 period shall automatically be extended and shall not expire until the accusation or petition has  
14 been acted upon by the Board.

15 ///

16 ///

17 ///


FROM :MAIL DEPOT

FAX NO. :2098592332

Jan. 26 2011 09:24AM P2/2

**ACCEPTANCE**

I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully discussed it with my attorney, Samuel Spital. I understand the stipulation and the effect it will have on my Vocational Nurse License. I enter into this Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Board of Vocational Nursing and Psychiatric Technicians.

DATED: 1/26/11  
IRENE R. KIRAN  
Respondent

I have read and fully discussed with Respondent Irene R. Kiran the terms and conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order. I approve its form and content.

DATED: 1/26/11  
Samuel Spital  
Attorney for Respondent

ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Board of Vocational Nursing and Psychiatric Technicians of the Department of Consumer Affairs.

Dated: 1/28/2011

Respectfully submitted,

KAMALA D. HARRIS  
Attorney General of California  
ARTHUR D. TAGGART  
Supervising Deputy Attorney General

  
ELENA L. ALMANZO  
Deputy Attorney General  
*Attorneys for Complainant*

SA2010102493  
10655376.docx

## Exhibit A

Statement of Issues No. VN-2009-2217

1 EDMUND G. BROWN JR.  
Attorney General of California  
2 ARTHUR D. TAGGART  
Supervising Deputy Attorney General  
3 ELENA L. ALMANZO  
Deputy Attorney General  
4 State Bar No. 131058  
1300 I Street, Suite 125  
5 P.O. Box 944255  
Sacramento, CA 94244-2550  
6 Telephone: (916) 322-5524  
Facsimile: (916) 327-8643  
7 *Attorneys for Complainant*

8 **BEFORE THE**  
**BOARD OF VOCATIONAL NURSING AND PSYCHIATRIC TECHNICIANS**  
9 **DEPARTMENT OF CONSUMER AFFAIRS**  
10 **STATE OF CALIFORNIA**

11 In the Matter of the Statement of Issues  
12 Against:

Case No. VN-2009-2217

13  
14 IRENE R. KIRAN aka  
IRENE RESHMI KIRAN  
15 2356 Hearthsong Drive  
Riverbank, California 95367

**STATEMENT OF ISSUES**

16  
17 Applicant/Respondent.

18  
19 Complainant alleges:

20 **PARTIES**

21 1. Teresa Bello-Jones, J.D., M.S.N., R.N. (Complainant) brings this Statement of  
22 Issues solely in her official capacity as the Executive Officer of the Board of Vocational Nursing  
23 and Psychiatric Technicians, Department of Consumer Affairs.

24 **Application Information**

25 2. On or about October 14, 2009, the Board of Vocational Nursing and Psychiatric  
26 Technicians, Department of Consumer Affairs, received an application for a Vocational Nurse  
27 License from Irene R. Kiran aka Irene Reshmi Kiran (Respondent). On or about August 6, 2009,  
28

1 Irene R. Kiran certified under penalty of perjury to the truthfulness of all statements, answers, and  
2 representations in the application. The Board denied the application on July 20, 2010.

### 3 JURISDICTION

4 3. This Statement of Issues is brought before the Board of Vocational Nursing and  
5 Psychiatric Technicians (Board), Department of Consumer Affairs, under the authority of the  
6 following laws. All section references are to the Business and Professions Code unless otherwise  
7 indicated.

### 8 STATUTORY PROVISIONS

9 4. Section 2866 of the Business and Professions Code (Code) provides, in pertinent  
10 part, that the Board of Vocational Nursing and Psychiatric Technicians (Board) may deny a  
11 license when it finds that the applicant has committed any acts constituting grounds for denial of  
12 licensure under section 480 of that Code.

13 5. Section 480 of the Code provides:

14 (a) A board may deny a license regulated by this code on the grounds that  
15 the applicant has one of the following:

16 (1) Been convicted of a crime. A conviction within the meaning of this  
17 section means a plea or verdict of guilty or a conviction following a plea of nolo  
18 contendere. Any action that a board is permitted to take following the establishment  
19 of a conviction may be taken when the time for appeal has elapsed, or the judgment  
20 of conviction has been affirmed on appeal, or when an order granting probation is  
21 made suspending the imposition of sentence, irrespective of a subsequent order under  
22 the provisions of Section 1203.4 of the Penal Code. .

23 (2) Done any act involving dishonesty, fraud, or deceit with the intent to  
24 substantially benefit himself or herself or another, or substantially injure another.

25 (3)(A) Done any act that if done by a licentiate of the business or  
26 profession in question, would be grounds for suspension or revocation of license.

27 (B) The board may deny a license pursuant to this subdivision only if the  
28 crime or act is substantially related to the qualifications, functions, or duties of the  
business or profession for which application is made.

(b) Notwithstanding any other provision of this code, no person shall be  
denied a license solely on the basis that he or she has been convicted of a felony if he  
or she has obtained a certificate of rehabilitation under Chapter 3.5 (commencing  
with Section 4852.01) of Title 6 of Part 3 of the Penal Code or that he or she has been  
convicted of a misdemeanor if he or she has met all applicable requirements of the  
criteria of rehabilitation developed by the board to evaluate the rehabilitation of a  
person when considering the denial of a license undersubdivision (a) of Section 482.

1 (c) A board may deny a license regulated by this code on the ground that  
2 the applicant knowingly made a false statement of fact required to be revealed in the  
3 application for the license.

4 6. Section 2878 of the Code states:

5 The Board may suspend or revoke a license issued under this chapter [the  
6 Vocational Nursing Practice Act (Bus. & Prof. Code, 2840, et seq.)] for any of the  
7 following:

8 (a) Unprofessional conduct, which includes, but is not limited to, the  
9 following:

10 (1) Incompetence, or gross negligence in carrying out usual nursing  
11 functions.

12 (2) A conviction of practicing medicine without a license in violation of  
13 Chapter 5 (commencing with Section 2000) in which event the record of conviction  
14 shall be conclusive evidence of the conviction.

15 (3) The use of advertising relating to nursing which violates Section  
16 17500.

17 (4) The use of excessive force upon or the mistreatment or abuse of any  
18 patient. For the purposes of this paragraph, "excessive force" means force clearly in  
19 excess of that which would normally be applied in similar clinical circumstances.

20 (5) The failure to maintain confidentiality of patient medical information,  
21 except as disclosure is otherwise permitted or required by law.

22 (6) Failure to report the commission of any act prohibited by this section.

23 (b) Procuring a certificate by fraud, misrepresentation, or mistake.

24 (c) Procuring, aiding, abetting, attempting, or agreeing or offering to  
25 procure or assist at, a criminal abortion.

26 (d) Violating or attempting to violate, directly or indirectly, or assisting in  
27 or abetting the violating of, or conspiring to violate any provision or term of this  
28 chapter.

(e) Making or giving any false statement or information in connection  
with the application for issuance of a license.

(f) Conviction of a crime substantially related to the qualifications,  
functions, and duties of a licensed vocational nurse, in which event the record of the  
conviction shall be conclusive evidence of the conviction.

(j) The commission of any act involving dishonesty, when that action is  
related to the duties and functions of the licensee.

7. Section 2878.6 of the Code states:

///

1 A plea or verdict of guilty or a conviction following a plea of nolo  
2 contendere made to a charge substantially related to the qualifications, functions and  
3 duties of a licensed vocational nurse is deemed to be a conviction within the meaning  
4 of this article. The board may order the license suspended or revoked, or may decline  
5 to issue a license, when the time for appeal has elapsed, or the judgment of conviction  
6 has been affirmed on appeal or when an order granting probation is made suspending  
7 the imposition of sentence, irrespective of a subsequent order under the provisions of  
8 Section 1203.4 of the Penal Code allowing such person to withdraw his plea of guilty  
9 and to enter a plea of not guilty, or setting aside the verdict of guilty, or dismissing  
10 the accusation, information or indictment.

#### 11 FIRST CAUSE FOR DENIAL OF APPLICATION

##### 12 (Convictions)

13 8. Respondent's application is subject to denial under Code sections 2866 and 480,  
14 subdivision (a)(1), in that Respondent has been convicted of the following crimes that are  
15 substantially related to the qualifications, functions and duties of a licensed vocational nurse:

16 a. On or about November 26, 2003, in the Stanislaus County Superior Court, State  
17 of California, in the matter entitled *People v. Irene Reshmi Kiran*, Case No. 1063107,  
18 Respondent was convicted on her plea of nolo contendere of violating Penal Code section 488  
19 (Petty theft). The circumstances were that on August 29, 2003, Respondent took items from a K-  
20 Mart store without paying for them.

21 b. On or about November 28, 2006, in the Stanislaus County Superior Court, State  
22 of California, in the matter entitled *People v. Irene Reshmi Kiran*, Case No. 1104827,  
23 Respondent was convicted on her plea of guilty to violating Penal Code section 484 (Grand theft).  
24 The circumstances were that between October 24, 2005, and November 14, 2005, Respondent  
25 used a co-workers credit card without permission to charge items at a Target Store.

#### 26 SECOND CAUSE FOR DENIAL OF APPLICATION

##### 27 (False Statement/Omissions of Facts on Application)

28 9. Respondent's application is subject to denial under Code sections 2866 and 480(c)  
in that she knowingly made a false state of fact required to be revealed on her application by  
listing only information about her 2006 conviction in response to question number 7 and 8 but did  
not list information regarding her petty theft conviction on November 26, 2003.

///

///



1 THIRD CAUSE FOR DENIAL OF APPLICATION

2 (Dishonesty, Fraud or Deceit)

3 10. Respondent's application is subject to denial under Code sections 2866 and 480(a)(2)  
4 in that she committed acts involving dishonesty, fraud, or deceit as more particularly set forth in  
5 paragraph 8, above.

6 FOURTH CAUSE FOR DENIAL OF APPLICATION

7 (Acts which would Constitute Discipline)

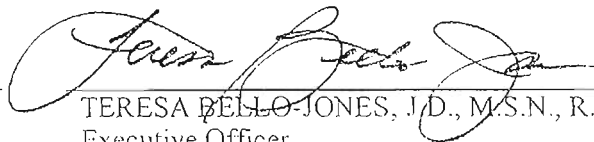
8 11. Respondent's application is subject to denial under pursuant to Code sections 2866  
9 and 480(3)(A) in conjunction with Code sections 2878 (e)(f) and (j), in that Respondent  
10 committed acts which if done by a licentiate of the profession would constitute cause for  
11 discipline, as more particularly set forth in paragraph 8, above.

12 PRAYER

13 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,  
14 and that following the hearing, the Board of Vocational Nursing and Psychiatric Technicians  
15 issue a decision:

- 16 1. Denying the application of Irene R. Kiran for a Vocational Nurse License;  
17 2. Taking such other and further action as deemed necessary and proper.

18 DATED: January 20, 2011

19 

20 TERESA BELLO-JONES, J.D., M.S.N., R.N.  
21 Executive Officer  
22 Board of Vocational Nursing and Psychiatric Technicians  
23 Department of Consumer Affairs  
24 State of California  
25 Complainant

23 SA2010102493  
24 10646725.doc